

Presentment Date and Time: July 16, 2013 at 10:00 a.m. (Prevailing Eastern Time)

Objection Deadline: July 15, 2013 at 4:00 p.m. (Prevailing Eastern Time)

Hearing Date and Time (Only if Objection Filed): July 25, 2013 at 10:00 a.m. (Prevailing Eastern Time)

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

Garrett A. Fail

*Attorneys for Lehman Brothers Holdings Inc.  
and Certain of Its Affiliates*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re**

**LEHMAN BROTHERS HOLDINGS INC., et al.,**

**Debtors.**

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**Chapter 11 Case No.**  
**08-13555 (JMP)**  
**(Jointly Administered)**

**NOTICE OF PRESENTMENT OF  
STIPULATION AND ORDER RESOLVING OBJECTION TO CLAIM**

**PLEASE TAKE NOTICE** that the undersigned will present the annexed Stipulation and Order Resolving Objection to Claim (the "Order") to the Honorable James M. Peck, United States Bankruptcy Judge, for signature on **July 16, 2013 at 10:00 a.m. (Prevailing Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that unless a written objection to the Order with proof of service is served and filed with the Clerk of the Court and a courtesy copy is delivered to the Bankruptcy Judge's chambers and the undersigned so as to be received by **July 15, 2013 at 4:00 p.m. (Prevailing Eastern Time)**, there will not be a hearing and the Order may be signed.

**PLEASE TAKE FURTHER NOTICE** that if a written objection is timely served and filed, a hearing (the "Hearing") will be held to consider the Order on **July 25, 2013 at 10:00 a.m. (Prevailing Eastern Time)** before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Custom House, Courtroom 601, One Bowling Green, New York, New York 10004.

**PLEASE TAKE FURTHER NOTICE** that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: July 8, 2013

New York, New York

/s/ Garrett A. Fail

Garrett A. Fail

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767 Fifth Avenue

New York, New York 10153

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
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**STIPULATION AND ORDER RESOLVING OBJECTION TO CLAIM**

Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”) for LBHI, and Andorra Banc Agricol REIG, S.A. (the “Claimant” and together with LBHI, the “Parties”), hereby stipulate and agree as follows:

**RECITALS**

A. On September 15, 2008, LBHI filed a voluntary petition under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”).

B. On November 2, 2009, Claimant filed proof of claim number 63849 against LBHI (the “Claim”) in the Bankruptcy Court.

C. On December 7, 2012, LBHI filed the Three Hundred Seventy-Eighth Omnibus Objection to Claims (No Liability Claims) [ECF No. 32651] (the “Objection”), seeking to disallow and expunge, inter alia, all portions of the Claim that relate to the security identified by ISIN XS0229269856, whether liquidated, unliquidated, or undetermined (such portions, collectively, the “No Liability Claim”).

D. On January 24, 2013, Claimant filed a response to the Objection [ECF No. 34181] (the “Response”).

E. As set forth below, Claimant desires the Response to be deemed withdrawn, the Objection to be resolved, and the No Liability Claim to be disallowed and expunged.

**AGREEMENT**

1. This Stipulation and Order shall become effective upon execution by all Parties and approval by the Bankruptcy Court (the “Stipulation Effective Date”).

2. Upon the Stipulation Effective Date: (a) the Response shall be deemed withdrawn; (b) the No Liability Claim shall be disallowed and expunged with prejudice; and (c) the Objection be deemed resolved.

3. The Court-appointed claims agent shall modify the claims register to reflect the terms of this Stipulation and Order.

4. This Stipulation and Order contains the entire agreement between the Parties as to the subject matter hereof and supersedes all prior agreements and undertakings among the Parties relating thereto.

5. This Stipulation and Order may not be modified other than by signed writing executed by all Parties and delivered to each Party.

6. Each person who executes this Stipulation and Order represents that he or she is duly authorized to do so on behalf of the applicable Party and that each such Party has full knowledge of, and has consented to, this Stipulation and Order.

7. This Stipulation and Order may be executed in multiple counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same instrument, and it shall constitute sufficient proof of this Stipulation and Order to present any copy, copies, or facsimiles signed by the Parties.

8. This Stipulation and Order shall inure to the benefit of, and shall be binding upon, the Parties and their respective successors, assignees, heirs, executors and administrators.

9. This Stipulation and Order shall be exclusively governed by and construed and enforced in accordance with the laws of the State of New York, without regard to its conflicts of law principles. The Bankruptcy Court shall have exclusive jurisdiction over any and all disputes arising out of or otherwise directly relating to this Stipulation and Order. Should the Bankruptcy Court abstain from exercising its jurisdiction or be found not to have jurisdiction over a matter directly relating to this Stipulation and Order, such matter shall be adjudicated in either the United States District Court for the Southern District of New York or a court of competent jurisdiction in the State of New York.

Dated: July 8, 2013

/s/ Garrett A. Fail

Garrett A. Fail

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

Attorneys for  
Lehman Brothers Holdings Inc.,  
as Plan Administrator

/s/ Michael Savetsky

Michael S. Etkin

Michael Savetsky

LOWENSTEIN SANDLER PC  
1251 Avenue of the Americas  
New York, New York 10020  
Telephone (212) 262-6700  
Facsimile (212) 262-7402

Attorneys for  
Andorra Banc Agricol REIG, S.A.

**SO ORDERED**, this  
\_\_\_ day of July, 2013 in New York

\_\_\_\_\_  
United States Bankruptcy Judge